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May 5, 2022

VIA ELECTRONIC FILING ONLY

Hon. Andrew T. Baxter
United States District Court
Northern District of New York
Syracuse, NY 13202

RE: Converse v. State Farm Insurance Co.
NDNY Case No. 5:21-cv-00457-TJM-ATB
Status Report

Your Honor:

This office represents the plaintiffs in this matter, Stephanie Converse and Richard Converse. Michael Welch, Esq., attorney for the defendant, and I have conferenced this matter and submit this letter as the status report and scheduling order, as follows:

- (1) Defendant's Amended Answer will be filed no later than May 6, 2022;
- (2) Plaintiff's First Set of Interrogatories to Defendant will be served no later than June 1, 2022;
- (3) Defendant's Responses to Interrogatories will be served no later than July 8, 2022;
- (4) All depositions will be noticed no later than July 15, 2022;
- (5) All depositions will be held no later than September 9, 2022;
- (6) All discovery shall be completed on or before October 7, 2022;

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(7) All motions will be filed no later than November 11, 2022; and

(8) The trial date is to be scheduled thirty (30) days after decisions are rendered on a Motion for Summary Judgment.

A proposed settlement/demand letter was forwarded to defense counsel on or about May 3, 2022, and I expect to receive a response within the next few weeks.

Please advise if there are any other issues the Court wishes the parties to address at this time. The parties are available to discuss any additional issues via a telephone conference at the Court's request.

Thank you for your consideration.

Sincerely,

WESTFALL LAW PLLC

/s/ Ryan L. McCarthy

Ryan L. McCarthy

RLM/wlb
CC Michael Welch, Esq.